KENYATTA K. STEWART, CORPORATION COUNSEL CITY OF NEWARK-DEPARTMENT OF LAW 920 BROAD STREET, ROOM 316 NEWARK, NEW JERSEY 07102 Attorney for Defendant City of Newark

By: Gary S. Lipshutz, Esq.

Assistant Corporation Counsel Telephone: (973) 733-5945 Facsimile: (973) 733-5394

Email: lipshutzg@ci.newark.nj.us

UNITED STATES DISTRICT COURT DISTRICT OF NEW JERSEY

ARIELLE FLETCHER, : Civ. No. 2:20-cv-3413-KSH-CLW

:

Plaintiff, : Honorable Katharine S. Hayden, U.S.D.J.

:

v. : Honorable, Cathy L. Waldor, U.S.M.J.

:

CITY OF NEWARK et al., : NOTICE OF MOTION TO DISMISS PLAINTIFF'S

AMENDED COMPLAINT

Defendants. :

To:

Joseph Rakofsky, Esq.
INJURY & ACCIDENT LAW ROKAFSKY, LLC
P.O. Box 23350
Newark, New Jersey, 07102

Counsel:

PLEASE TAKE NOTICE that the Defendant City of Newark, will apply to the above-named Court, on November 16, 2020, for an Order Dismissing the Amended Complaint.

TAKE FURTHER NOTICE, that the Defendant shall rely upon the annexed Brief, and,

TAKE FURTHER NOTICE, that oral argument is requested.

KENYATTA STEWART
CORPORATION COUNSEL
Attorney for Defendants

By: <u>/s Gary S. Lipshutz</u>

Gary S. Lipshutz, Esq.

Assistant Corporation Counsel

Dated: October 16, 2020